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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

MAKAYLA M. RUSSELL o/b/o P.R.,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 1:24-CV-01356-GSA

STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME TO FILE THE
ELECTRONIC CERTIFIED
ADMINISTRATIVE RECORD AS THE
ANSWER TO PLAINTIFF'S COMPLAINT

Pending the Court's approval, the parties stipulate through their respective counsel that Defendant, the Commissioner of Social Security (the "Commissioner"), shall have a thirty-day extension of time to respond to Plaintiff's Complaint in this case from March 31, 2025, up to and including April 30, 2025. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due to be filed by March 31, 2025.

Defendant previously requested two extensions of this deadline. ECF Nos. 10 and 12.

2. Despite working diligently to meet the case deadlines, Defendant needs additional time in the instant case to consult with the client agency to determine the appropriate response.
3. For this reason, I am requesting an extension to April 30, 2025 (30 days), to file an Answer or other response in this matter.
4. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he has no objection to this extension request.
5. This request is made in good faith and is not intended to delay the proceedings in this matter.
6. I am attempting to preserve limited judicial resources and have applied the most rapid response under the circumstances.

WHEREFORE, Defendant requests until April 30, 2025, to respond to Plaintiff's Complaint.

Respectfully submitted,

DATE: March 25, 2025

SACKETT & ASSOCIATES, PC

/s/ Harvey Peter Sackett*

HARVEY PETER SACKETT

Attorney for Plaintiff

(*as authorized via email on March 25, 2025)

MICHELE BECKWITH

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Office of Program Litigation, Office 7

Social Security Administration

DATE: March 25, 2025

By

s/ Justin L. Martin

JUSTIN L. MARTIN
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: **March 25, 2025**

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE